

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MY24HOURNEWS.COM, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No.
AT&T CORP., VERIO, INC.,	)	1:18-cv-01647-MHC
NTT AMERICA, INC., and	)	
GENACOM, INC.,	)	
	)	
Defendants.	)	

**JOINT CONSENT MOTION FOR EXTENSION OF TIME, EXTENSION  
OF PAGE-LIMITS, AND STAY OF DISCOVERY DEADLINES**

Plaintiff My24HourNews.com, Inc. (“Plaintiff”) and Defendants AT&T Corp. (“AT&T”), Verio Inc. (“Verio”), NTT America, Inc. (“NTTA”), and Genacom, Inc. (“Genacom”) (collectively, “Defendants”), hereby jointly move the Court for: (1) an extension of time up to and including August 6, 2018, for the Plaintiff to file separate response briefs in opposition to Defendants motions to dismiss, (2) leave for the Plaintiff to file separate response briefs in opposition to Defendants’ motions to dismiss, none of which shall exceed forty (40) pages in length, (3) an extension of time up to and including September 6, 2018, for the Defendants to file reply briefs in support of their motions to dismiss, (4) leave for Defendants to file reply briefs in support of their motions to dismiss not to exceed

twenty (20) pages in length, and (5) a stay of all discovery deadlines—including the deadlines for filing Initial Disclosures and the Joint Preliminary Report and Discovery Plan—until after the Court issues its ruling on the Defendants motions to dismiss. In support of this Consent Motion, the parties show the Court as follows:

1. Plaintiff filed this action on April 18, 2018. *See* Doc. 1.
2. The Complaint is 71 pages, includes 312 separately numbered paragraphs, and alleges 22 causes of action. *Id.*
3. Pursuant to a schedule approved by the Court [Doc. 22], Defendants filed Motions to Dismiss on June 21, 2018. *See* Docs. 33, 34, and 36.
4. Defendant AT&T's brief in support of its motion to dismiss is 40 pages and seeks dismissal of all 22 causes of action in the Complaint. Defendants Verio and NTT's combined brief in support of their motion to dismiss is 36 pages, and seeks to dismiss all causes of action against each of them in the Complaint. Defendant Genacom's motion to dismiss incorporates each of the arguments raised by Defendants AT&T, Verio and NTT.
5. An extension of time for Plaintiff to prepare its responses to each of the Defendants' motions, through and including August 6, 2018, will allow sufficient time for Plaintiff to research and draft its briefs in response to each motion to dismiss lodged against the Complaint.

6. The Parties agree that an extension of time for Plaintiff to file separate responses to Defendants' motions to dismiss, up to and including August 6, 2018, is appropriate.

7. The Parties also agree that the page-limits for the Plaintiff's response briefs in opposition to Defendants' motions to dismiss, should be extended so as not to exceed forty (40) pages in length.

8. The Parties agree that an extension of time for Defendants to file separate reply briefs in support of their motions to dismiss, up to and including September 6, 2018, is appropriate.

9. The Parties agree that the page-limits for the Defendants' reply briefs in support of their motions to dismiss, should be extended so as not to exceed twenty (20) pages in length.

10. Finally, in the interest of judicial economy and to avoid unnecessary time and expense, the Parties also agree that a stay of all discovery deadlines—including the filing of Initial Disclosures and the Joint Preliminary Report & Discovery Plan—is appropriate until the Court issues its order on the Defendants' motions to dismiss.

11. A proposed Order granting this Joint Consent Motion is attached as Exhibit A.

WHEREFORE, the undersigned parties request that the Court enter an order granting: (1) an extension of time up to and including August 6, 2018, for the Plaintiff to file separate response briefs in opposition to Defendants' motions to dismiss, (2) leave for the Plaintiff to file separate response briefs in opposition to Defendants' motions to dismiss, none of which shall exceed forty (40) pages in length, (3) an extension of time up to and including September 6, 2018, for the Defendants to file reply briefs in support of their motions to dismiss, (4) leave for Defendants to file reply briefs in support of their motions to dismiss not to exceed twenty (20) pages in length, and (5) a stay of all discovery deadlines—including the deadlines for filing Initial Disclosures and the Joint Preliminary Report and Discovery Plan—until after the Court issues its ruling on the Defendants motions to dismiss.

Respectfully submitted, this 2nd day of July, 2018.

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**CERTIFICATE OF SERVICE**

This is to certify that on this day I served the foregoing upon the following attorneys by using the Court's CM/ECF system, which will send notice of the filing to all counsel authorized to receive it, and by email:

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This 2nd day of July, 2018.

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